

1 **FOLEY & LARDNER LLP**
2 Jeffrey R. Blease (CA Bar. No. 134933)
3 Tel: [\(617\) 226-3155](tel:(617)226-3155); jblease@foley.com
4 Thomas F. Carlucci (CA Bar No. 135767)
5 Tel: [\(415\) 984-9824](tel:(415)984-9824); tcarlucci@foley.com
6 Shane J. Moses (CA Bar No. 250533)
7 Tel: [\(415\) 438-6404](tel:(415)438-6404); smoses@foley.com
8 Emil P. Khatchatourian (CA Bar No. 265290)
9 Tel: [\(312\) 832-5156](tel:(312)832-5156); ekhatchatourian@foley.com
10 Ann Marie Uetz (admitted *pro hac vice*)
11 Tel: [\(313\) 234-7114](tel:(313)234-7114); auetz@foley.com
12 Matthew D. Lee (admitted *pro hac vice*)
13 Tel: [\(608\) 258-4203](tel:(608)258-4203); mdlee@foley.com
14 555 California Street, Suite 1700
15 San Francisco, CA 94104-1520

16 *Counsel for the Debtor
17 and Debtor in Possession*

18 **UNITED STATES BANKRUPTCY COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 OAKLAND DIVISION**

21 In re:

22 THE ROMAN CATHOLIC BISHOP OF
23 OAKLAND, a California corporation sole,

24 Debtor.

25 Case No. 23-40523 WJL

26 Chapter 11

27 **NOTICE OF HEARING ON DEBTOR'S
28 MOTION FOR ENTRY OF AN ORDER,
PURSUANT TO BANKRUPTCY RULES
9006 AND 9027, ENLARGING THE PERIOD
WITHIN WHICH THE DEBTOR MAY
REMOVE ACTIONS PURSUANT TO 28
U.S.C. § 1452**

29 Judge: Hon. William J. Lafferty

30 Date: August 22, 2023

31 Time: 1:30 p.m.

32 Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

33 [In person or via Zoom]

34 **PLEASE TAKE NOTICE THAT** a hearing will be held on **Tuesday, August 22, 2023, at 1:30**
35 **p.m.** (the "Hearing"), and will take place at the United States Bankruptcy Court, 1300 Clay Street,
36 Oakland, California, before the Honorable William J. Lafferty, United States Bankruptcy Judge, to
37 consider the *Debtor's Motion For Entry of an Order, Pursuant To Bankruptcy Rules 9006 and 9027,*
38 *Enlarging The Period Within Which The Debtor May Remove Actions Pursuant To 28 U.S.C. § 1452* (the
39 "Motion"), filed concurrently herewith by The Roman Catholic Bishop of Oakland, a California

1 corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”) in the above-
2 captioned chapter 11 bankruptcy case (the “Bankruptcy Case”).

3 The Motion seeks an order extending the period within which the Debtor may remove civil actions
4 and proceedings pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 from August 7, 2023, through
and including February 5, 2024.

5 The Motion is based upon this Notice; the Motion and the memorandum of points and authorities
6 set forth therein; the declarations filed in support thereof; any and all supplemental papers that may be
7 filed by the Debtor; the papers on file in this bankruptcy case; and on such arguments or evidence as may
8 be presented at the hearing. Copies of the Motion and papers filed in support thereof, and all pleadings
and papers filed in this Bankruptcy Case, can be obtained from the website maintained by the Debtor’s
claims and noticing agent, Kurtzman Carson Consultants LLC, at <https://www.kccllc.net/rcbo>.

9 **PLEASE TAKE FURTHER NOTICE THAT** the Hearing will be held in person in the
10 courtroom, provided that (1) counsel, parties, and other interested parties may attend the hearing in person
11 or by Zoom; (2) additional information is available on Judge Lafferty’s Procedures page on the Court’s
12 website, which is <http://www.canb.uscourts.gov>; and (3) information on how to attend the hearing by
13 Zoom will be included with each calendar posted under Judge Lafferty’s Calendar on the court’s website.
14 All parties should review Judge Lafferty’s Practices and Procedures for In-Person Hearings, found on the
15 Court’s website.

16 **PLEASE TAKE FURTHER NOTICE THAT** opposition, if any, to the granting of the relief
17 sought in the Motion must be in writing, filed with the Bankruptcy Court not later than seven (7)
days before the date set for the Hearing. Any opposition must be filed in writing with Clerk of the
18 Bankruptcy Court at 1300 Clay Street, Suite 300, Oakland, California, 94612 (mailing address: P.O. Box
19 2070, Oakland, California, 94604) and must be served on counsel for the Debtor at the address listed
20 above. Unless a timely objection is filed, the Court may grant the relief requested in the Motion without
21 a hearing. Failure to file and serve a timely objection may result waiver of any objection.

22 DATED: August 1, 2023

FOLEY & LARDNER LLP

23 Jeffrey R. Bleas
24 Thomas F. Carlucci
25 Shane J. Moses
26 Emil P. Khatchatourian
27 Ann Marie Uetz
28 Matthew D. Lee

/s/ Shane J. Moses

Shane J. Moses

Counsel for the Debtor
and Debtor in Possession